II. REMARKS

Claims 1-34 are pending in this application. Reconsideration in view of the following remarks is respectfully requested.

Applicant does not acquiesce in the correctness of the rejections and reserves the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicant reserves the right to pursue the full scope of the subject matter of the claims in a subsequent patent application that claims priority to the instant application.

In the Office Action, claims 1-5 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 6,308,163 to Du *et al.* This rejection is respectfully traversed.

First, the Office alleges that Du *et al.* teach "identifying all super roles of said role F." Office Action at 3. In support, the Office cites column 12, lines 46-59, which read, in part (emphasis added):

> Roles are logical representations of resource requirements for workflow activities in terms of capabilities. Roles are used by activity definers (when creating new activities) to map activities into resources. Roles may be a boolean expression specifying the resource types needed for the activity.

The present application defines and uses "role" quite differently. For example, on page 14, the phrase "functional role" is defined, in part, as (emphasis added):

> Any non-hierarchical role that represents a particular function. In the model of the present invention, any resource may be assigned one or several functional roles, but this assignment is not mandatory. Whenever a resource is assigned a functional role, we assume that it can service all sub-functions of this functional role. Therefore, a functional role represents services and areas of expertise available within the organization. Users may be assigned several functional roles according to their skills or ability to render a certain type of service.

Applicant asserts, therefore, that the use of the term "role" in Du *et al.* is distinct from its use in the present application. In fact, the uses are opposite. Du *et al.* use the term to describe

resource requirements while the present application uses the term to describe "function[s]," "services and areas of expertise," and "skills or abilit[ies]."

Second, the Office alleges that Du *et al.* teach "returning best matching resource as x if role F is a hierarchical role." Office Action at 3. Applicant asserts, however, that the contrary use of "role" by Du *et al.*, as explained above, makes such a teaching by Du *et al.* impossible.

Third, the Office alleges that Du *et al.* teach "iteratively identifying a parent role from said list of super roles." Office Action at 3. Specifically, the Office cites column 12, lines 53-58, which read:

> Given this information, the resource manager automatically generates virtual nodes, such as the nodes that are shown as being shaded in FIG. 9, which is the resource hierarchy 194 of FIG. 8, but with the hierarchy extended with roles.

As noted above, the contrary use of "role" by Du *et al.* makes such a teaching by Du *et al.* impossible.

In addition, the Office cites FIG. 6 of Du *et al.*, and, specifically, step 164. Applicant asserts, however, that the Office has misinterpreted FIG. 6 of Du *et al.* Nothing in FIG. 6 or its accompanying text teaches identifying a parent role from a list of super roles. Du *et al.* state:

> ...when a negative response is generated at the decision step 156, the resource engine 140 returns a NULL and the request is sent to the policy engine 130 at step 160. The policy engine applies substitution policies at step 162. The application of substitution policies provides an increased range of resources that are determined to have a capability of performing the work item for which the original resource request was generated.
>
> At step 164, the query is returned to the resource engine 140 for a second attempt at finding a resource that satisfies the request.

Column 10, lines 14-24 (emphasis added).

Thus, Du *et al.* do not teach identifying a parent role from a list of super roles, regardless of the definition of "role" one uses. Rather, Du *et al.* teach a substitution of broadened search criteria when a first search for a resource yields no result. Identification of a parent role, under

any definition of "role," would require the substitution of narrower search criteria when a first search for a resource yielded more than one result.

Finally, the Office alleges that Du *et al.* variously teach "identifying a current role R from said iteratively identified parent role," "identifying in said organizational unit all resources, other than said resource x, that has said current role R, and if there is at least one identified resource, then, returning said identified resource(s) as best matching resource," and "identifying all servicing organizational units for said current role R." Applicant asserts, however, that Du *et al.*'s contrary use of "role" makes each alleged teaching impossible.

Therefore, Applicant asserts that Du *et al.* do not teach "identifying all super roles of said role F," "returning best matching resource as x if role F is a hierarchical role," "iteratively identifying a parent role from said list of super roles," "identifying a current role R from said iteratively identified parent role," "identifying in said organizational unit all resources, other than said resource x, that has said current role R, and if there is at least one identified resource, then, returning said identified resource(s) as best matching resources," or "identifying all servicing organizational units for said current role R" and do not, therefore, make obvious any of claims 1-5. Accordingly, Applicant respectfully requests withdrawal of the rejection.

In the Office Action, claims 6-19 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Du *et al.* in view of U.S. Patent No. 5,826,239 to Du *et al.* (the '239 patent). This rejection is respectfully traversed.

The Office alleges that Du *et al.* teach "a search engine interfacing with said one or more databases and utilizing stored information to determine workflow routing in said matrix organizational model." Office Action at 9.

Applicant asserts, however, that nothing cited by the Office and nothing in Du *et al.* or the '239 patent teaches a matrix organizational model. The present application defines a matrix organization as "any given set of [a resource, an organizational unit, an organizational hierarchy, a hierarchical role, a functional role, a functional organization link, and a global function of an organizational unit] which involves functional organization links between organizational units." Application at 15. An organizational unit is "[a]ny logical grouping of resources." *Id.* at 13. "Functional [organizational] links are used to define the scope of services provided by a servicing organization[al] unit to a service, or 'client' organization[al] unit." *Id.* at 14.

As noted above, Du *et al.* teach the grouping of resource requirements, not the grouping of resources. Further, Du *et al.* do not teach functional organizational links used to define the scope of services provided by such groups of resources. Du *et al.* do not, therefore, teach a matrix organizational model. The '239 patent fails to cure these defects in the teachings of Du *et al.* Accordingly, Applicant respectfully requests withdrawal of the rejection.

In the Office Action, the Office states that "[c]laims 20-34 recite limitations already addressed by the rejection of Claims 1-19 above, therefore the same rejection applies." Office Action at 16. Accordingly, for the reasons given above, Applicant asserts that none of claims 20-34 is obvious over Du *et al.* alone or in view of the '239 patent and respectfully requests withdrawal of the rejection.

Applicant notes that the above deficiencies in the teachings of Du *et al.* and the '239 patent are attributable to the fundamental differences in their structures and methodologies, as compared to the present invention. That is, each of Du *et al.* and the '239 patent utilize resource managers (*e.g.*, local resource managers (LRMs), global resource managers (GRMs), etc.) to monitor and/or allocate resources based upon a request for resources. Each resource, therefore,

must be pre-categorized and assigned to one or more resource managers in order for the resource to be made available in response to a request for resources, which is submitted to a resource manager.

Contrarily, the present invention eschews the use of resource managers in favor of a matrix organizational model, whereby organizational, hierarchical, and functional components of an organization are separated and resources allocated based upon a rules-based system. In particular, the present invention utilizes functional links, which "allow a portion of an organization tree/sub-tree to be made available as a provider of some service or function to another sub-tree that is part of a completely different organization." Application at 4. In other words, the rules-based system of the present invention may permit any resource to be allocated in response to a request for resources, even if the organizational, hierarchical, or functional components of the organization did not originally envision or anticipate such an allocation.

In view of the foregoing, Applicant respectfully requests withdrawal of the rejection, and allowance of the application. Should the Examiner require anything further from Applicant, the Examiner is invited to contact Applicant's undersigned representative at the number listed below.

Respectfully submitted,

Ronald A. D'Alessandro
Reg. No. 42,456

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Hoffman, Warnick & D'Alessandro LLC
Three E-Comm Square
Albany, New York 12207
(518) 449-0044
(518) 449-0047 (fax)